


**INTEROFFICE CORRESPONDENCE**

000029736

DATE: June 16, 1992

TO: M. S. Simmons, Foundry, Bldg. 444, X7574

FROM:  D. L. Schubbe, Remediation Programs, Bldg. 80, X8709

SUBJECT: CLOSURE OF RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) UNIT NO. 45,  
ORIGINAL URANIUM CHIP ROASTER, IHSS 204 - DLS-006-92

The Colorado Department of Health (CDH) has recently provided EG&G with clarification in which a specific Individual Hazardous Substance Site (IHSS) may be closed on an accelerated schedule. The accelerated schedule as discussed in CDH's letter dated May 29, 1992 (attached) may be used to attempt to close RCRA Unit No. 45 (i.e., the Original Uranium Chip Roaster) prior to the regulatory deadline (i.e., loss of interim status) of November 8, 1992. After November 8, 1992, RCRA Interim Status will no longer be in effect and the use of the Original Uranium Chip Roaster may have to cease in order to comply with RCRA.

The general process associated with implementation and completion of a RCRA closure plan and approximate time in working days required is presented below:


- |  |              |
|--|--------------|
| 1) Prepare/modify closure plan                             | 53 days      |
| 2) CDH review/comment resolution                           | 31 days      |
| 3) Public review and comment                               | 21 days      |
| 4) Finalize closure plan/regulatory approval               | 30 days      |
| 5) Implement closure plan                                  | 200 days     |
| 6) Obtain "Independent Certification" of RCRA closure plan | 10 days, and |
| 7) CDH final review and approval of closure                | 21 days.     |

In order to accelerate the RCRA closure of the Original Uranium Chip Roaster, an updated RCRA closure plan which represents current operations and conditions of RCRA Unit No. 45 must be submitted to CDH. Remediation Programs Division (RPD) can oversee the preparation of an updated closure plan; however, prior to initiation of the process described above, the appropriate funding must be obtained. RPD requested funding for implementation of the RCRA Interim Status closure plans from DOE/RFO on February 4, 1992. No response has been received from DOE/RFO regarding RPD's funding request for RCRA closures. Similarly, no funding is currently available for RPD to oversee closure plan updating, implementation and reporting requirements.

Due to the lack of funding and the amount of time which would be necessary for closure of a RCRA Unit, closure of the Original Uranium Chip Roaster by November 8, 1992, is highly unlikely.

**ADMIN RECORD**

U N U

REVIEWED FOR CLASSIFICATION/UCNI	
BY	G. T. Ostried 
DATE	4-17-95

A-DU15-000210

M. S. Simmons  
June 16, 1992  
DLS-006-92  
Page 2

For example, the following items have completion times which are not controllable by EG&G:

- 1 ) CDH closure plan review and comment time;
- 2 ) Public review and comment time;
- 3 ) Procurement subcontracting process time;
- 4 ) Laboratory sample analysis turnaround time;
- 5 ) CDH RCRA closure approval time; and
- 6 ) DOE/RFO funding allocation time.

If you have questions regarding this correspondence please contact D. L. Schubbe on extension 8709.

DLS:cet

Attachment:  
As Stated

cc:  
M. B. Arndt  
P. W. Edrich  
F. D. Hobbs  
R. T. Ogg  
G. S. Taylor